



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management  
DIVISION OF SITE REMEDIATION  
291 Promenade Street  
Providence, R.I. 02908-5767

18 October 1996

Mr. Philip Otis, P.E., Remedial Project Manager  
US Department of the Navy, Northern Division  
Code 18, Mail Stop #82  
10 Industrial Highway  
Lester, PA 19113-2090

RE: Proposed Plan - Sites 06 (Solvent Disposal Area) & 11 (Fire Fighting Training Area)  
Naval Construction Battalion Center, Davisville, Rhode Island  
Submitted 15 August 1996

Dear Mr. Otis;

The Rhode Island Department of Environmental Management (RIDEM) Office of Waste Management has reviewed the above referenced document. Comments are attached.

If you have any questions or require additional information please call me at (401) 277 3872 ext. 7138.

Sincerely,

Richard Gottlieb, P.E.  
Principal Sanitary Engineer

cc: W. Angell, DEM OWM  
C. Williams, EPA Region 1  
H. Cohen, RIEDC  
M. Cohen, ToNK

letter1.rwg/richg

Comments for:

**Proposed Plan For:  
Sites 06 (Solvent Disposal Area &  
11 (Fire Fighting Training Area)  
Naval Construction Battalion Center  
Davisville, Rhode Island**

Submitted 15 August 1996

1. **Page 5, Section 2.6, Additional Public Information;  
RIDEM Listing.**

Please change Rhode Island DEM contact to:

RI Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, RI 02908

Contact Person:  
Richard Gottlieb  
(401) 277-3872 x7138

2. **Page 13, Section 3.4.2, Nature and Extent of Constituents of Concern (COC);  
Site 06, Inorganic Analytes (Surface Soils), Paragraph 3, Last Sentence.**

*Since only one of the samples did contain lead levels above 150 ppm (616 ppm), the soil would be considered "lead-free" under Rhode Island regulations if no impacted soil is exposed and the environmental lead management plan is implemented.*

This sentence implies that a soil is considered lead-free if a lead management plan is implemented. This sentence should be removed since a lead management plan would only be implemented if the soil were not considered lead free.

3. **Pages 21 & 22, Section 3.6, The Navy's Rationale For the NFA Preferred Alternative;  
Site 06, Paragraph 2, Last Sentence Pg 21, First Sentence Pg 22.**

*Since only one of the samples did contain lead levels above 150 ppm (616 ppm), the soil would be considered "lead-free" under Rhode Island regulations if no impacted soil is exposed and the environmental lead management plan is implemented.*

This sentence implies that a soil is considered lead-free if a lead management plan is implemented. This sentence should be removed since a lead management plan would only be implemented if the soil were not considered lead free.

4. **Page 23, Section 4, For More Information;**

## **RIDEM Listing.**

Please change Rhode Island DEM contact to:

Richard Gottlieb  
RI Department of Environmental Management  
Office of Waste Management  
235 promenade Street  
Providence, RI 02908  
Phone: (401) 277-3872 x7138

### **5. Figure 1, Site Locus Map.**

Please revise Figure to only highlight Sites 06 and 11. It might also be helpful for the general public if the NCBC boundaries are also highlighted.

### **6. General Comment.**

Since the Navy is proposing a no further action for Site 06 it must therefore meet residential environmental criteria. Site 06 had one location where lead was detected at a concentration of 616 ppm which is above "lead-safe" criteria as defined in Sections B.1.1 (a)(1) and B.2.4(b)(2)(i) of the Rules and Regulations for Lead Poisoning Prevention [R 23-24.6-PB] of the Rhode Island Department of Health. This level would require a lead management plan. Sections B.1.5(a)(5) and B.3.3(c)(4) of the above mentioned regulations require a composite sample. The Navy did not take a composite sample, but rather obtained discreet samples. It may be possible to obtain a variance from the regulations whereby the discreet samples can be averaged to simulate a composite sample. As the Navy has noted, the average of the samples for Site 06 would be 93.36 ppm which is below the "lead-free" criteria and a lead management plan would therefore not be required. RIDEM is requesting that the Navy apply for an application for a variance from the Rhode Island Rules and Regulations for Lead Poisoning Prevention [R23-24.6-PB] Sections B.1.5(a)(5) and B.3.3(c)(4) relating to soil lead evaluation. Please note that the format used for Site 05 and 08 (dated 22 March 1995) should be used for Site 06. Please contact RIDEM prior to transmitting the variance request to the RI Department of Health.

Site 11 did not exceed the "lead-free" criteria for any samples obtained therefore a variance is not required for this site.